

PUBLIC COMMENTS SUBMITTED AT HIGHLANDS  
COUNCIL MEETING ON JUNE 15, 2017

Date: June 15, 2017

To: New Jersey Highlands Water Protection and Planning Council

From: Wilma Frey, Senior Policy Manager, NJ Conservation Foundation

Re: **Borough of Bloomsbury, Proposed Highlands Redevelopment Area Designation**

It is unfortunate that the public was not advised of ~~the~~<sup>e</sup> revised material on the Bloomsbury Redevelopment Area in a more timely fashion. The documents, dated May 19, were prepared over a month ago, the day after last month's Highlands Council meeting.

The Supplemental Highlands RMP Consistency Review, Part 2 - Water Resources, Subpart B - Protection of Water Resources Quantity, determines that the proposed project is ***inconsistent with RMP Policy 2D4***: Restrict development and uses of and within a Prime Ground Water Recharge Area that reduce natural ground water recharge volumes ***or may directly or indirectly contribute to or result in water quality degradation***. The project is found to be ***inconsistent with the four following policy objectives***: Objectives 2D4a, 2D4b, 2D4c and 2D4d.

The project is located in a Net Water Deficit Area, HUC 14(s), Musconetcong River Warren Glen to I-78. The January 25, 2017 Highlands RMP Consistency Determination Review Part 2, Water Resources, Subpart A, Water Resources Availability, ***found the project inconsistent with Objectives 2B8a and 2B8b***: "Prevent net increases in consumptive or depletive water uses in current Water Deficit Areas to prevent exacerbation of and help reduce or eliminate the deficit to ensure sustainable water supply, water resource and ecological values, emphasizing techniques including, but not limited to water reuse, recycling and conservation."

**Objective 2B8b**: "Proposed new consumptive or depletive water uses within a Current Deficit Area shall only occur under the auspices of a Water Use and Conservation Management Plan approved under Objective 2B8c or through mitigation of the proposed consumptive or depletive use within the same HUC 14 subwatershed: a permanent reduction of existing consumptive and depletive water uses; ground water recharge in access of the requirements of NJAC 7:8 (Stormwater Mgmt. rules), or other permanent means."

The January 2017 consistency determination review found that two policies were not applicable (N/A). ***However, had these policies been implemented through more complete water resources planning at the HUC 14 level***

***and above, the project would have been found inconsistent.*** The two policies are:

Policy 2B4: "To strictly limit consumptive and depletive water uses to the water availability in each HUC 14 subwatershed and to establish priorities for water uses that implement the policies and objectives of the RMP." .

Policy 2B5: "Require the use of water conservation, recycling and reuse methods (where appropriate) and devices for any redevelopment or development activity to minimize consumptive water use tailored to meet the resource protection and other goals for each Zone and considering subwatershed-specific conditions and net Water Availability status."

"Where a Water Use and Conservation Management Plan has not been approved:

1. Each project shall achieve mitigation ranging from 125% to 200%, based on the severity of the Current Deficit and the amount of consumptive or depletive water use proposed." (There are four additional criteria as well.)

***In view of these multiple inconsistencies of the project in important matters of water supply, existing water deficit, and water quality protection, we do not believe that the project should be permitted to move forward without fully addressing all of these important water resource issues.***

I'm Hank Klumpp - I own 150 acres in the Highlands Preservation Area.

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In 2004, many people had their lives changed when McGreevy, in his last ditch effort to save his reputation, signed the poorly written, seldom read Highlands Act. My 150 acre farm, along with many others, contributed to the huge land grab like sacrificial lambs in what was then said to be in the name of "SAVE THE WATER." Politicians came close to showing babies suffering from dehydration. Of course, almost thirteen years later, property owners still have not been compensated for what was a political - not scientific - property value grab. I have asked

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since day one to see the scientific study that put my farm in the Highlands preservation area, and believe me — no one can find it. However, in the meantime, the New Jersey Water Supply Authority gets its water supply for free — while I no longer have any equity in my property.

I, along with others, am paying the price for the ten golf courses in the Raritan Basin System to water their lush grass. The ten golf courses use over one million gallons of water daily. Each golf course only pays peanuts a day for this water. Who is taking

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advantage of who? If the Highlands Act was designed to conserve water, how can this waste of water be justified when it is also being reported that New Jersey uses tens of millions of gallons more water a day than their watersheds can safely supply?

I, along with others, am being punished by having my farmland value taken along with its equity not to hydrate babies but to water golf courses. Don't you think something is wrong with these actions?

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Hank Klumpp